

EXHIBIT 1

1 being poured?

2 A. Yes.

3 Q. Okay. And you don't know who was pouring it?

4 A. No. But I'm at the point where I knew things
5 were getting serious, because the water didn't
6 stop and I couldn't breathe.

7 Q. Okay. At that point, either right before the
8 water started or right during when the water
9 started, did you know who was in the room?

10 A. Right after the water stopped I got my first
11 look around the room, and I recognized Thomas
12 and Harte.

13 Q. You're referring to Officer Charles Thomas?

14 A. Yep, Chuck Thomas.

15 Q. And Sergeant Harte?

16 A. Yep. He was standing there with -- with a cam
17 recorder, recording the whole thing.

18 Q. Okay. Well, I'll get to that in a minute.

19 But at that point, when you got your bearings
20 and you were able to look around the room, you
21 were able to identify Charles Thomas by
22 vision, by seeing him?

23 A. Yeah.

1 Q. And you knew who he was, right away?

2 A. Yes.

3 Q. Okay. And is that because you've had previous
4 time with him?

5 A. Yes.

6 Q. How about Sergeant Harte, you knew exactly who
7 he was when you saw him?

8 A. Yes.

9 Q. Is that because you had previous time with
10 him?

11 A. Encounters, yes.

12 Q. So you have Sergeant Harte in the room,
13 Charles Thomas in the room. You later found
14 out Troy Mitchell was in the room. Who else
15 was in the room at that point when you came to
16 and you were able to get your bearings?

17 A. The two guys that escorted me, they were in
18 there. And then there was this other guy --
19 there was another CO there that I didn't
20 recognize.

21 Q. So three other individuals?

22 A. The CERT Team was there, but I don't know who
23 those guys are. And some of them didn't have

1 anything to do with it. Like, they weren't
2 near me.

3 Q. Okay. So you've identified Charles Thomas,
4 Sergeant Harte and then later found out Troy
5 Mitchell. Of these -- it sounded like you
6 said three other officers, is that about
7 right, were in the room?

8 A. Three, four, yeah.

9 Q. Okay. Do you know who they were, as you sit
10 here today?

11 A. I know the escorting officers were there and
12 the CERT guys.

13 Q. What are their names?

14 A. I can't tell you their names. I had never had
15 an encounter with CERT before.

16 Q. So was it two individuals from CERT?

17 A. I don't know.

18 Q. You never saw them before that day?

19 A. Correct. I can't tell you who's on the CERT
20 Team and who's not on the CERT Team. I'm not
21 in the Department of Corrections.

22 Q. But when you saw those one or two individuals
23 from CERT in the room, at that time, you

1 didn't know who they were, correct?

2 A. That is correct.

3 Q. And the escort officers, who were they by
4 name?

5 A. Giancola, Phillips, Thomas, Harte, Mitchell.

6 Q. Now, you mentioned Giancola. Did you
7 recognize him by face when you saw him in the
8 room?

9 A. I did. I didn't know his name until later on,
10 though.

11 Q. So you knew you were familiar with that
12 Officer?

13 A. Not familiar. I wasn't familiar with him. I
14 just knew his face, because he was one of the
15 guys that slammed me on -- or that tried to
16 slam me on the bed in the hospital at Auburn
17 and decided to pull the pin.

18 Q. And how did you learn of his name later on?

19 A. Because I called the witness to my hearing.
20 They showed up. I had their names on my
21 ticket.

22 Q. Okay. And you said also Officer Phillips was
23 in the room, correct?

1 A. That's correct.

2 Q. And did you know Officer Phillips by face?
3 Did you know him already?

4 A. Same situation.

5 Q. Okay. You learned of his name later?

6 A. That's correct. On my incident report, my
7 ticket, and then I got to put it together when
8 he came to testify at my hearing.

9 Q. Okay. And then there were CERT officers in
10 the room as well, but you don't know who they
11 were?

12 A. That's correct. But it was Thomas, Chuck
13 Thomas, the escorting officers. Troy Mitchell
14 was the main assailant. Either Giancola or
15 Phillips is the guys that spread my legs. But
16 I can't tell you the other names of the
17 officers in the room.

18 Q. Okay.

19 A. I wasn't -- I was pretty caught up in trying
20 to close my legs, not write down names.

21 Q. So once the use of water stops, they stopped
22 putting water on your face, were you able to
23 pull down your shirt from your face?

1 A. No. He pulled it down.

2 Q. Who's that?

3 A. Lieutenant Mitchell.

4 Q. Okay. And then what happened next?

5 A. He laughed and started punching me in my face.

6 Q. Okay. And you're shackled at this point?

7 A. Always shackled.

8 Q. Okay. And was anyone holding you up? Well,
9 let me back up. Were you still on the bed or
10 were you standing up at this point?

11 A. I was still on the bed. The whole thing
12 happened while I was on the bed.

13 Q. Okay. So you're laying on your back on the
14 bed, correct? Is that a yes?

15 A. Yes.

16 Q. Okay. And you're saying Sergeant --
17 Lieutenant Mitchell starts punching you in the
18 face?

19 A. Yeah. And I was moving, trying to get away
20 from his punches. He punched me all over the
21 place, not just the face.

22 Q. Okay. Where else did he punch you?

23 A. Punched me everywhere. My upper torso, let's

1 just say.

2 Q. Okay.

3 A. Upper torso to my head. Face, head.

4 Q. And when you say punch, was it a closed fist
5 or slaps? What was it?

6 A. Closed fist.

7 Q. Okay. And was he using any type of weapon or
8 was it just his fists?

9 A. As first it was just his fists, until he moved
10 to my genitals. Grabbed my --

11 Q. Okay.

12 **MS. FREEMAN:** Objection. Pat, please
13 stop interrupting Mr. Raymond while he's
14 answering.

15 **BY MR. MACKEY:**

16 Q. Okay.

17 A. Grabbed my genitals. And after he grabbed my
18 genitals, and didn't get the desired -- I
19 didn't scream, he started punching my
20 genitals. And I still didn't scream, but I
21 was squirming, trying to get my legs closed,
22 that's when he pulled his baton, started
23 hitting me with the baton.

1 And after that, after he hit me with the
2 baton between my legs, that's when I screamed.
3 He stopped hitting me between my legs, and
4 then hit me in the face with the baton.

5 Q. All right. I want to back up, though, to go
6 over your story. So Troy Mitchell starts by
7 beating you on -- punching you on the face in
8 the upper torso, right?

9 A. Yes.

10 Q. Okay. Was anyone else hitting or punching you
11 or kicking you at that point?

12 A. No.

13 Q. Was anyone else holding you down to help
14 Mr. Mitchell?

15 A. Not while he was punching me.

16 Q. Okay. So at this point, it's just
17 Mr. Mitchell that's hitting you?

18 A. Yes, sir.

19 Q. Okay. Now, what happens next? Once he stops
20 hitting you in the face and the torso, where
21 does Mr. Mitchell go next?

22 A. He really caught me off guard by grabbing my
23 genitals, so I didn't think to squeeze my legs

1 closed. But after the first time he
2 grabbed -- tried to grab my genitals, I
3 squeezed my legs closed really tight. And
4 next thing you know he's, like, hold his
5 fucking legs open.

6 They held my legs open, grabbed me,
7 twisted. And then, like, I don't know why I
8 didn't scream, but I hadn't screamed yet. He
9 stops grabbing me, and then he starts punching
10 me in my genitals.

11 Then it moved to -- while he's grabbing
12 me, before he starts punching me, he calls me
13 a stupid little bitch. Then he starts
14 punching me, and then he grabs his baton.
15 Three or four times he hit me in my -- between
16 my legs. I think it was three.

17 But that's when I screamed, and that's
18 when he sort of hit me with the backhand
19 across the face with the baton. And then he
20 said, get this bitch -- take this fucking
21 bitch to the box.

22 Q. Let me back up a little bit. When you were
23 getting hit in the face, was he hitting you on

1 Q. Okay.

2 A. It was probably his right hand because of the
3 way the mark -- the mark that it left on my
4 face. So if he's walking away and smacks me
5 with the backhand, it left the mark going
6 diagonal. That's what, I think, closed my
7 eye.

8 Q. And Lieutenant Mitchell was on your right hip
9 or right side of your body this whole time?

10 A. Yes.

11 Q. Okay. At any time, did anyone on your left
12 side of your body hit you?

13 A. No.

14 Q. Okay. At any time, did anyone hit you other
15 than Lieutenant Mitchell?

16 **MS. FREEMAN:** Objection.

17 **THE WITNESS:** Nobody hit me but
18 Mitchell.

19 **BY MR. MACKEY:**

20 Q. Okay.

21 A. But the other guys just held my legs open.

22 Q. Now, what comments were made by Lieutenant
23 Mitchell while this was going on? I know you

1 mentioned he made the comment about something
2 like little bitch, but did he make any other
3 type of comments?

4 A. Stupid little bitch. He laughed initially,
5 then the stupid little bitch comment, and then
6 get -- take this bitch to the box.

7 Q. What's the box?

8 A. SHU, sir.

9 Q. Okay. So was anyone else making any comments
10 during the alleged assault by Mr. Mitchell?

11 A. After a while -- I don't -- like I said, I
12 can't give you a time that it lasted. To me,
13 it lasted forever. Forever. Absolutely
14 forever. But at some point Chuck Thomas was
15 the one that said that's enough, that's
16 enough.

17 Q. Who was he saying that to, Lieutenant
18 Mitchell?

19 A. You're going to kill him.

20 Q. Okay. And where was Officer Thomas standing
21 when he said that, if you know?

22 A. On the other side of the bed, away from
23 Mitchell.

1 Q. Okay. Where -- okay. So you located Officer
2 Thomas. Where was Sergeant Harte during
3 Lieutenant Mitchell's alleged attack?

4 A. Sergeant Harte was behind Officer Thomas
5 during the altercation.

6 Q. How far away were they standing from the bed?

7 A. Thomas was probably two, three feet, tops.
8 And Harte was eight feet. He was back
9 farther. Like, he got that whole thing in
10 frame.

11 Q. Now, you mentioned that you think Sergeant
12 Harte was videotaping this?

13 A. I don't think, I know. I can state it as a
14 fact.

15 Q. How do you know that?

16 A. He had the camera and he was going like this,
17 pointing it at me. And then after it was all
18 over, they made the comment, get rid of that
19 fucking chip, the card. Get rid of that
20 fucking card. And then Mitchell said, you
21 know what, fuck that, get rid of the whole
22 camera.

23 Q. When did he start filming or videotaping?

1 **BY MR. MACKEY:**

2 Q. Mr. Mitchell, we just took -- sorry.

3 Mr. Raymond, we just took a ten minute break
4 at 4:10, and we're back on at -- at 4:00 we
5 took a break, and we're back on at 4:11. So
6 an eleven minute break. I'm just going to
7 continue asking questions, all right,
8 Mr. Raymond?

9 A. Yes.

10 Q. So at any time that you were in the emergency
11 room, did you try to do any type of force or
12 lunge towards any of the officers that were in
13 the room?

14 A. No.

15 Q. Okay. First thing you remember is you were
16 lying in the bed?

17 A. Yes.

18 Q. Okay. And when Mr. Mitchell's alleged attack
19 was over, how did you get out of the bed?

20 A. They pulled me out of the bed and -- yeah,
21 they pulled me out.

22 Q. Who was they?

23 A. Chuck Thomas was one. And I don't know the

1 other one.

2 Q. Okay. And you said earlier that Officer
3 Thomas made the comment that Lieutenant
4 Mitchell needed to stop?

5 A. Yeah.

6 Q. Okay. And what did Lieutenant Mitchell say,
7 if anything, to Officer Thomas?

8 A. He didn't say anything at all.

9 Q. Did he stop at that point?

10 A. No.

11 Q. Was it your scream that prompted the stop?

12 A. That's what it seemed like. I screamed, and
13 then the hit to the face and it was -- it was
14 over.

15 Q. Okay. Then the backhand to the face, that was
16 the last hit?

17 A. Yes. The backhand with the baton, yes.

18 Q. Okay. The backhand was with the baton?

19 A. Yes.

20 Q. Okay. Were you bleeding at this point?

21 A. Yeah.

22 Q. Whereabouts?

23 A. My face, my ear, my chest. A few minutes

1 later, during the escort, I started bleeding
2 out of my eye.

3 Q. Okay. So who -- you basically were pulled out
4 of the bed when you started going out of the
5 room?

6 A. Yes. And I told them I just -- they pulled me
7 out of the bed after a nurse came in. And she
8 said, do you have any injuries to report? I
9 looked up at her and I said, please help me.
10 She said, what hurts? I said, my penis, my
11 neck, my face, my eye is swollen shut. She
12 looked at the CO and said, get this piece of
13 shit the fuck out of here.

14 Q. What nurse are you referring to?

15 A. Nurse Hoppins.

16 Q. And did you know her already? Is this someone
17 you were familiar with?

18 A. No.

19 Q. Okay. This is the first time you ever met
20 Nurse Hoppins?

21 A. I believe so. I mean, that was the first
22 interaction of memorable -- it was the first
23 memorable interaction.

1 Q. How did you later learn that her name was
2 Nurse Hoppins?

3 A. After I had gotten out of -- like, through the
4 OSI stuff. You know, mumbling from the
5 corrections officers, inmates. She was
6 bragging about it like she had something to do
7 with it. Like, she was a part of beating
8 my -- beating me up. And that's basically the
9 gist of how I found out who it was.

10 And then I identified her, because she's
11 very -- she doesn't look like anything -- like
12 any of the other nurses there, so they knew
13 exactly who I was talking about. And again,
14 they showed me some pictures. She really
15 stood out. I knew exactly who she was.

16 Q. And this is OSI that showed you photos?

17 A. Actually, I think, maybe the captain that
18 interviewed me identified the nurse. I'm not
19 sure, though, but I don't think it was OSI
20 that was concerned about the nurse.

21 Q. Was Nurse Hoppins in the room during the
22 alleged assault?

23 A. No, she was not.

1 Q. Okay. She was called in afterwards?

2 A. She was there initially, and then they told
3 her to get out.

4 Q. How do you know that?

5 A. Because they told her to get out as he --
6 like, that last -- that last level, coming
7 out, I realized Mitchell's got me by my face,
8 my shirt is upright. And this is before he
9 starts pouring the water. When I looked over
10 at her, he was like, you better get out of
11 here.

12 Q. And he told Nurse Hoppins to get out?

13 A. She left. She did leave, yeah. And then the
14 next thing I know, I saw her and -- yeah. Get
15 this piece of shit the fuck out of here.

16 Q. Now, at that point, where were your injuries
17 after Lieutenant Mitchell's alleged assault?

18 A. My genitals, my neck, my face, my chest, my
19 back, my eye.

20 Q. Your neck and back were hurting at that point?

21 A. Yeah. Mostly my neck, yeah. Most of the pain
22 was my neck and my genitals. But the genital
23 pain really -- man, it was -- it was

1 something -- I could never describe it.

2 Q. Okay. What caused your neck pain?

3 A. You know, I've talked to doctors and
4 therapists about that, but it could have been
5 anything, like the injury to C1. When I'm
6 trying to get my head away from him as he's
7 throwing punches, and, you know, I'm moving
8 around, and he's hitting me and -- this is
9 what they tell me -- that it caused trauma to
10 my neck, like, when your head snaps so hard,
11 that you just go really quick, you know,
12 that's damage to your neck. So I think that's
13 how I got my neck hurt.

14 But again, he also -- I don't think this
15 is what it is, but I got punched on the side
16 of my neck when he missed my face. He punched
17 my face, my neck, my chest. All over the
18 place.

19 Q. Okay. Was there any direct below to your
20 neck?

21 **MS. FREEMAN:** Object to the form.

22 **BY MR. MACKEY:**

23 Q. You can go ahead and answer, Mr. Raymond.

1 Q. And Nurse Hoppins comes in and -- I don't know
2 the exact words you said.

3 A. No, I wasn't standing up when Ms. Hoppins came
4 in.

5 Q. Okay. Were you still laying down?

6 A. I was still laying down on the bed.

7 Q. Okay. And then --

8 A. And then she came in with her clipboard. And
9 there's a piece of paper on the clipboard that
10 says inmate reported injuries or something
11 like that.

12 Q. Okay. And what happens next?

13 A. She asked me if I had any injuries to report,
14 as she's looking at me bleeding out of all
15 these surfaces on my body. And I just -- I
16 asked her for help. I said, please help me.
17 And she said, what injuries do you have to
18 report? I told her my penis really hurt, my
19 testicles hurt, my neck hurts. She wrote
20 something down on the clipboard and said, get
21 this piece of shit the fuck out of here.

22 Q. Okay. And then what happens?

23 A. That's when I was grabbed, stood up and they

1 actually -- Lieutenant Mitchell left. He took
2 off out of the room. Then it was me, Harte,
3 Thomas, Giancola, Phillips. That guy, I
4 really don't know his name. And then the
5 two -- there was two COs. I don't know if
6 they were in the room, but they kept walking
7 back and forth from the emergency treatment
8 room to the desk that's right outside the
9 door.

10 And they were like, listen -- Thomas came
11 up to me and said, listen, are you okay? I
12 said, man, I'm really not okay. And he said,
13 well, I got to take these chains off you. Are
14 you going to freak out? I said, man, I don't
15 have it in me. I need help. He said, well, I
16 got nothing to do with that.

17 And he takes the chains off, they take the
18 cuffs, they transfer it to around my back, and
19 they take the shackles off, and we started
20 walking. And that's when I realized that I
21 was having a hard time walking. They took me
22 to the box.

23 And then I was in -- the sergeant in the

1 box refused to take the pictures of me. They
2 cleaned me up. Bunch of pictures were taken.
3 They put all new -- they took pictures of my
4 body. They put new -- brand new State green,
5 brand new white t-shirt, brand new everything
6 on me. Then they cleaned off my face again
7 with baby wipes, and then they took another
8 picture of me, and then they walked me to my
9 cell.

10 Q. Okay. Let me stop you there. Were you still
11 in the emergency treatment room when the --

12 **MS. FREEMAN:** Matt, please let
13 Mr. Raymond finish his answer. Matt, if you
14 had more to say, go ahead.

15 **MR. MACKEY:** He appeared to be done.

16 **MS. FREEMAN:** I'm sorry. Mr. Mackey,
17 you said I'm going to stop you there. So I
18 just want to make sure, Matt, that you said
19 everything.

20 **THE WITNESS:** I'm good, Emma. I'm okay.

21 **BY MR. MACKEY:**

22 Q. So were you in the emergency treatment room
23 when the shackles were taken off?

1 A. Yes.

2 Q. Okay. And you were standing up at that point?

3 A. Yes.

4 Q. Okay. And then you were handcuffed -- your
5 hands were put behind you with handcuffs?

6 A. Yes, sir.

7 Q. Okay. So at that point, is that the only
8 restraint on you, the handcuffs behind your
9 back?

10 A. Yes, sir.

11 Q. Okay. And there's nothing restricting you
12 from walking at that point? There's no chains
13 or anything like that?

14 A. Correct, sir. They took those off as well.

15 Q. Okay. And --

16 A. They had me walk through the facility in
17 transportation chains. It's DOCCS policy.
18 You have to take them off as soon as you're in
19 a secure area.

20 Q. Okay. Who -- let me back up. At that point
21 you said you realized, when you started
22 walking, you had difficulty walking, right?

23 A. Yeah. It wasn't -- it didn't, like, jump out

1 at me. It just -- I noticed, like, I
2 couldn't -- my right leg, it just didn't -- it
3 didn't want to go, and then I couldn't make it
4 up the stairs. I couldn't walk up the stairs.
5 And Tom was like, yo, what the fuck is going
6 on with you? I said, I don't know, man. He's
7 like, all right, we're going to take the
8 elevator, because I couldn't carry your big
9 ass up the stairs. We get in the elevator.
10 There was no incident. And then -- yeah, like
11 I said.

12 Q. Okay. When you say pain walking, was it -- or
13 difficulty walking, were you able to stand up
14 straight? Were you hunched over or were
15 you --

16 A. Standing up straight. And I'm not -- it
17 didn't -- I don't know how to explain it, but
18 it didn't hurt. It didn't hurt. I just could
19 not -- I couldn't, like, take a full step. It
20 was -- and it was like that for years. I have
21 to install a chair lift at my house because I
22 can't walk up and down stairs.

23 Q. So was it just a difficulty of putting one

1 foot in front of the other?

2 **MS. FREEMAN:** Object to the form.

3 **THE WITNESS:** No. No. I have trouble
4 walking.

5 **BY MR. MACKEY:**

6 Q. Okay. Do you still have trouble walking?

7 A. Periodically, yes.

8 Q. Okay. And you mentioned your right leg. You
9 had trouble walking with your right leg. Is
10 it still the same now, is it trouble on your
11 right side?

12 A. Yes.

13 Q. Okay. And what diagnosis have you been
14 provided by the doctors related to that?

15 A. They said that -- you know, he said it's
16 probably from the trauma I sustained to my
17 neck. But there's no official diagnosis. You
18 know, it's just my doctor says I took a lot of
19 trauma, you know, and my body is presenting
20 those symptoms from -- as the result of the
21 trauma that I sustained.

22 Q. Has it been referred to as nerve damage,
23 anything like that?

1 A. Yes. Yes. I'm actually on medication for
2 nerve damage. What's that?

3 Q. What medication?

4 A. Neurontin.

5 Q. I'm sorry. What was it again?

6 A. Neurontin.

7 Q. Neurontin.

8 A. I've had the nerve damage tests. All came
9 back conclusive.

10 Q. Now, on a scale of one to ten, how bad was
11 your pain right after the alleged assault?

12 A. It was really high at first, after he hit me
13 the third time in the genitals. And then it
14 kind of went down a little bit. So it started
15 at, like, a nine, ten, and then it went to,
16 like, a four.

17 And then, you know, as I walked, it got
18 worse. But when I got sitting still, it went
19 back down. And then eventually it just
20 escalated. It got worse and worse and worse.
21 Later on, I also ended up finding out that was
22 because of my prostate expanding from the
23 trauma.

1 Q. Okay. Now, you're taken out of the emergency
2 treatment room and you're brought to SHU,
3 correct?

4 A. Correct.

5 Q. Who escorted you from the emergency treatment
6 room to SHU?

7 A. So it was me, Thomas, Harte, and this -- I
8 don't know this other guy's name. I just
9 don't know. I've never seen him before. I
10 don't know his name.

11 Q. And did you go straight to SHU or did you go
12 anywhere else before you went to SHU?

13 A. I went straight to SHU. They tried to walk me
14 up the stairs. I couldn't walk up the stairs,
15 so we did the elevator.

16 Q. Okay. Did anything beyond the norm happen
17 while you were escorted from the emergency
18 treatment room to SHU?

19 A. Not the first time. The second time I got
20 escorted is when things went beyond the norm.

21 Q. Okay. Well, we'll get to that. So you're
22 escorted to SHU, and then you're put in a
23 cell?

1 A. No. They took all the clothes -- the bloody
2 clothes off of me, they cleaned me up, took
3 pictures, put brand new clothes on me, took
4 pictures again, made me sign a piece of paper.

5 And then -- oh, while I got up there, they
6 said to me, we have absolutely nothing to do
7 with what those guys did to you, so please do
8 not act out up here, because we didn't do that
9 to you, and we would have never done that to
10 you. And then I got escorted to my cell.

11 Q. Who made those comments to you?

12 A. The sergeant. Very heavy set, blonde hair.
13 He's the one that said that to me.

14 Q. Okay. But not Sergeant Harte?

15 A. No. Harte left. Harte left as soon as the
16 institutional cameras picked me up. Because
17 his job was to video record me that entire
18 time. And then once -- because the SHU has a
19 lot of cameras in there. Once you walk in the
20 SHU, the sergeant is no longer needed to
21 videotape you, because you're already on film
22 once you walk in there.

23 Q. Okay. So you're cleaned up, you're given new

1 clothes and then you're put into a cell at
2 SHU?

3 A. Yeah. I'm cleaned up, they take pictures, new
4 clothes, more pictures, they put me in the
5 cell. But on the walk down to the cell,
6 everybody saw me and basically were screaming.
7 It was a mad house. Everybody was like, look
8 what you did to him. My eye had started
9 bleeding again. My face was bleeding.

10 So the other inmates started to go crazy.
11 I get in my cell. I tell them I need help, I
12 need help. And they're like, we can't do
13 anything, there's nothing we can do to help
14 you. So one of the guys on my -- in my tank
15 said to me -- said, hey, Matt, you need to go
16 to MHU. So I fashioned a noose, and told them
17 I was going to commit suicide and put it
18 around my neck.

19 Q. And this is while you're in your cell in SHU?

20 A. Correct.

21 Q. Did you have intent of committing suicide or
22 you just did this to get the --

23 A. I did it to get treatment. And that's when I

1 Q. Well, let's look at the second photo. Is that
2 what you're referring to as your eye being
3 swollen shut?

4 A. Yeah.

5 Q. And I just want to clarify. These photos were
6 taken once you got to SHU?

7 A. Yeah. But you can't -- yeah, these were the
8 ones that they took after -- I don't know if
9 you're seeing something different, but I
10 can't -- in my copy, it's all grainy. I can't
11 really see anything. Like, I can kind of see
12 the handprints around my throat. My throat.

13 **MS. FREEMAN:** If you're going to ask
14 more questions about these photographs, I
15 think sometimes the reproductions aren't
16 great, so maybe you can zoom in on the screen
17 on the photo you want to question about.

18 **BY MR. MACKEY:**

19 Q. I can do that. This photo here, the one I
20 have on the screen. Mr. Raymond, are you
21 looking at the hardcopies or the screen?

22 A. Now I'm looking at the screen.

23 Q. Okay. This is the photo, you say, shows the

1 Q. So let me pull up the complaint that you
2 filed. If you look -- this is Exhibit 1,
3 which is the complaint or the amended
4 complaint. Mr. Raymond, if you look at
5 paragraph 92, do you see that on the screen?
6 Mr. Raymond?

7 A. Yes. I was just reading it, sir.

8 Q. Okay.

9 A. Yeah, I see it.

10 Q. All right. So according to paragraph 92, it
11 says: For weeks after the assault,
12 Mr. Raymond remained in physical agony and
13 repeatedly filed sick call request forms
14 regarding blood in his urine, pain upon
15 urination and pain in his lower abdomen,
16 groin, lower back and sides.

17 Do you see that?

18 A. Yes, sir.

19 Q. Okay. When you say you remained in physical
20 agony, were you in pain? How long were you in
21 pain after September 14th, 2016?

22 **MS. FREEMAN:** Object to the form.

23 **THE WITNESS:** I've been in pain since

1 then.

2 **BY MR. MACKEY:**

3 Q. Okay. And you reported that every day you
4 went to the doctor you would inform them that
5 you had pain?

6 **MS. FREEMAN:** Objection.

7 **THE WITNESS:** Yes.

8 **BY MR. MACKEY:**

9 Q. Okay. And the second sentence says: At all
10 times he was denied necessary medical care or
11 given insufficient and/or incomplete care.

12 Were you -- you're claiming that you were
13 denied care by Nurse Hoppins?

14 A. Yes.

15 Q. Okay. And then there's -- you've also sued
16 Dr. Deborah Geer in this case. Are you
17 claiming that Dr. Geer refused to provide you
18 medical care or sufficient medical care?

19 A. Yes.

20 Q. Okay. How many times did you meet with
21 Dr. Geer?

22 **MS. FREEMAN:** I'm sorry. Pat, I didn't
23 hear that question.